

Jerome Schreiberstein, SBN 154051  
Teresa McLoughlin Rice, SBN 157175  
THE LOUDERBACK LAW FIRM  
One Embarcadero Center, Suite 2300  
San Francisco, CA 94111  
Telephone: (415) 398-7860  
Facsimile: (415) 398-7863

Attorneys for Defendant BAYER CORPORATION

Hunter Pyle, SBN 191125  
SUNDEEN SALINAS & PYLE  
1330 Broadway, Suite 1830  
Oakland, California 94612  
Telephone: 510.663.9240  
Facsimile: 510.663.9241

Attorneys for Plaintiff MERCY IHAMA

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO

MERCY IHAMA,

Plaintiff,

vs.

BAYER CORPORATION; and DOES 1-20,  
inclusive,

Defendants.

Case No.: 3:05-CV-03483 WHA

STIPULATION AND [PROPOSED] ORDER  
TO EXTEND THE DEADLINE FOR  
MEDIATION

Honorable William Alsup  
Trial Date: December 4, 2006

Plaintiff Mercy Ihama and Defendant Bayer Corporation, through their respective attorneys,  
hereby stipulate as follows:

1. The parties to this matter have met and conferred and agreed to conduct certain limited  
discovery prior to mediation. This discovery includes certain written discovery (which has already  
been propounded by both parties) and two depositions. Without this discovery, the parties concur that  
mediation would not be an efficient use of time or resources. Furthermore, during the pre-mediation  
conference call, the mediator agreed that a short continuance of time would be beneficial.

2. The parties intend to complete the above-referenced written discovery by February 28, 2006 and to complete substantial portions of the anticipated depositions by mid-March. For this reason, they jointly request that the Court grant a forty-five day continuance of the date by which mediation must be completed from February 8, 2006 to March 27, 2006. This will allow the parties sufficient time to make a preliminary assessment of the case and facilitate a more efficient ADR process.

3. The parties agree and understand that by continuing the date by which mediation must be completed, none of the other dates set by the Court in this case will be affected.

**IT IS SO STIPULATED.**

Dated: January 12, 2006

THE LOUDERBACK LAW FIRM

By:           /S/          

Teresa McLoughlin Rice  
Attorneys for Defendant  
BAYER CORPORATION

Dated: January 12, 2006

SUNDEEN, SALINAS & PYLE

By:           /S/          

Hunter Pyle  
Attorneys for Plaintiff  
MERCY IHAMA

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated:                                 



WILLIAM ALSUP  
United States District Court Judge